

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JOSHUA WINER,

Plaintiff,

v.

UMAYMAH MOHAMMAD, et al.,

Defendants.

Civil Action No.: 1:25-cv-02329-TWT

**CONSENT MOTION FOR (I) EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO COMPLAINT AND (II) TO EXTEND
TIME FOR PLAINTIFF’S RESPONSE TO ANY MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 6(b) and Local Rule 7.1, Plaintiff Joshua Winer (“Plaintiff”) and Defendant AJP Educational Foundation, Inc., d/b/a American Muslims for Palestine (“AMP”) file this consent motion to extend the time for AMP to file an answer or otherwise respond to Plaintiff’s operative amended complaint through August 6, 2025, and for Plaintiff to be permitted to respond to any motion to dismiss filed by AMP as to the complaint through September 29, 2025.

1. According to Plaintiff’s affidavit of service, AMP was served on or about June 13, 2025 with a copy of the amended complaint, which would make AMP’s responsive deadline July 7, 2025.

2. Given defense counsel's schedule and the volume of the complaint, Plaintiff has agreed to stipulate to extend the time for AMP to file an answer or motion to dismiss through August 6, 2025.

3. Counsel for AMP has agreed and stipulated to extend the time for Plaintiff to respond to AMP's anticipated motion to dismiss, so that Plaintiff will have through September 29, 2025 to file his response.

4. This consent motion is made in good faith and no party will be prejudiced as a result of the extension.

5. A proposed order reflecting the agreed-upon extension of time is submitted with this motion.

Dated: July 4, 2025

Respectfully submitted,

SLATER LEGAL PLLC

/s/ James M. Slater

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*The Constitutional Law Center for
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Counsel for Plaintiff

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(B) in Times New Roman 14-point typeface.

Dated: July 4, 2025.

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